

SWS Variance Request

According to Section 1 of WPN 14-4: Quality Work Plan Requirement:

All tasks performed on client homes must meet the specifications, objectives and desired outcomes outlined in the Standard Work Specifications for Home Energy Upgrades (SWS) where applicable.

However, as Grantees update and revise their field standards to align with the SWS, they may discover certain specifications that cannot be implemented precisely as described in the relevant SWS. In such cases, Grantees may request a variance from the relevant SWS.

To be granted a variance, the attached request form must be completed in full. Complete one form for each variance requested, which may on occasion include more than one SWS. For example, requested variances from SWS requirements related to installing insulation where knob and tube wiring is present would apply to 2.0601.1 Knob and Tube Wiring (Health and Safety section), and 4.1001.2 Knob and Tube Wiring (Insulation section). Both relevant SWS would be included on a single form.

- Where SWS requirements conflict with state or local codes, include specific code language, or active links to such.
- Where requests are of a technical nature, e.g., altering CO action levels, include supporting technical references.

Variance requests will be assessed:

- Individually, not as a package, so each request must include the necessary signature(s).
- Based on the ability of the Grantee to ensure that the desired outcome and objectives of the relevant SWS will be met.

Forward completed variance requests to your DOE WAP Project Officer (P.O.)

Do not include variance requests in State Application and State Plan materials.

SWS Variance Request Form
(complete one form for each request)

Proposed State Standard	
Relevant SWS(s)	
Objective of Relevant SWS	
Difference between Proposed and SWS Language	
Specific Conditions Where Variance will Apply	
Reasoning/Justification (Include supporting technical materials as appropriate)	

DOE Review Notes:

Required Signatures:

Grantee Representative submitting request

Date

DOE Technical Approval

Date

Variance Request Instructions

Proposed State Standard - Include specific standards language and references where available.

Relevant SWS(s) - Link to relevant SWS; indicate specific row where appropriate.

Objective of Relevant SWS - Copy text from relevant SWS(s).

Difference between Proposed and SWS Language - Describe difference between proposed standard and SWS.

Specific Conditions Where Variance will Apply - Describe situations where variance would apply, e.g., specific housing types, building details, or circumstances.

Reasoning/Justification (*Include supporting technical materials as appropriate*) - Explain reasoning for requesting the variance, and how Grantee will ensure the desired outcome and objectives of the SWS will still be met.

Sample Completed Table

Proposed State Standard	The (State) WAP Field Standards shall require under-floor grade will be cleared of all vegetation and organic material. Debris that can cause injury or puncture ground covers (e.g., nails, glass, sheet metal screws, etc.) will be removed from the crawl space. Care will be taken to prevent punctures during installation.
Relevant SWS(s)	https://sws.nrel.gov/spec/201113 row a
Objective of Relevant SWS	Minimize punctures in ground liner Minimize habitat for pests (Integrated Pest Management—IPM) and contaminant sources
Difference between Proposed and SWS Language	SWS requires removal of debris greater than 1". We may leave larger debris, but only if there is no danger of such debris puncturing ground liner.
Specific Conditions Where Variance will Apply	Crawl spaces under all housing types
Reasoning/Justification (Include supporting technical materials as appropriate)	Raking the entire crawl space is often time-consuming, difficult, and brings little reward, i.e., if there is no danger of punctures in ground cover to be installed. Would rather invest that time into proper installation and/or other important measures. The intent of the SWS will be met by making sure puncture hazards are removed and ground cover is puncture free at time of final inspection.